

TEXAS WATER COMMISSION



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Allen Beinke, Executive Director
 August 13, 1990

Mr. Vincent Passanante
 Safety-Kleen Corporation
 2130 E. Grauwyler Road
 Irving, Texas 75061

Re: Transmittal of RCRA Facility Assessment
 Safety-Kleen/Irving
 Industrial Solid Waste Registration No. 55194

Dear Mr. Passanante:

Transmitted herewith is the RCRA Facility Assessment (RFA) for Safety-Kleen Corporation in Irving, Texas. The RFA document includes the Preliminary Review and Visual Site Inspection documents.

The facility has existing units consisting of four RCRA-regulated units and one certified clean closure RCRA unit. A visual site inspection was conducted on August 2, 1990. No evidence exists to indicate releases from any of the units; therefore no further action is recommended.

Question on the RFA should be directed to the staff permit writer indicated below within 30 days of the receipt of this letter.

<u>Application</u>	<u>Permit Writer</u>	<u>Permit No.</u>	<u>EPA I.D. No.</u>
Safety-Kleen/Irving	Leon Byrd	HW-50218	TXD 981052061 <i>TH</i>

Sincerely,

Ray Henry Austin, P.E.
 Minor Brooks Hibbs, Chief
 Permits Section
 Hazardous and Solid Waste Division

CLB:kh

Enclosure

cc: Anthony Robledo, EPA Region VI - Dallas
 TWC District 4 Office -Duncanville (with enclosure)

Texas Water Commission

INTEROFFICE MEMORANDUM

LB
EPA REGION VI
HAZARDOUS WASTE
RCRA PERMITS BRANCH
1992 FEB 25 AM 10:34

TO : The Files - Safety-Kleen Corporation DATE: 7-30-90
Industrial Solid Waste Registration No. 55194
THRU : Charles E. Mauk, Head, Facility Unit IV, H&SW Permits *Cm*

FROM : Leon Byrd, H&SW Permits Section

SUBJECT: Preliminary Review for Safety-Kleen Corporation - Irving

Attached is the Preliminary Review for Safety-Kleen Corporation's Irving Facility. The solvent recycling/storage and transfer facility is located on the west side of Suzanne Drive, 500 feet south of Grauwyler Road and 1000 feet east of Loop 12; Dallas County, Texas. The site is situated in the northeast portion of the city of Irving in an industrial area.

The hazardous waste management units at the facility include an above-grade 15,000-gallon carbon steel tank, two separate container storage areas, one exchange station (aka Return/Fill Shelter), and one below-grade 10,000-gallon carbon steel tank (certified closed).

Clean solvents are leased from Safety-Kleen and subsequently returned as spent or contaminated solvent (a waste material). At this site, small quantities of spent solvent are combined into larger volumes and ultimately shipped to a Safety-Kleen recycling facility or similar contract reclaimer. After the impurities are removed from the spent solvent, the product (solvent) is returned to the Irving facility for distribution; thus forming a solvent circuit.

A visual site inspection is recommended for the entire facility to (1) obtain design and operation details about which only partial information is known, (2) to look for signs of releases, (3) to determine the status of each unit, and (4) to look for waste management units which might not otherwise be found.


Leon Byrd

LB:ok

PRELIMINARY ASSESSMENT FACILITY CHECKLIST

FACILITY: Safety-Kleen/Irving
EPA I.D. NO.: TXD 981052061
REGISTRATION NO.: 55194
HAZIT NO.: None

REVIEWER: Leon Byrd
SECTION: H&SW Permits
DATE: 3-19-90

I. WASTE MANAGEMENT UNITS

RCRA Regulated Units:

- 1 Tank, above-grade, Area "A", active
- 1 Warehouse Drum Storage Area, Area "C" active
- 1 Container Storage-Metal Shelter, Area "D" active
- 1 Return/Fill Shelter, active
- 1 Tank, below-grade, Area "B", closed

II. REVIEWED DOCUMENTS

- A. RCRA: Part A and Part B Permit Applications
- B. CERCLA Notification - None found
- C. Inspection Reports

TWC, CEI 6/22/89
TWC, CEI 11/8/88
TWC, CEI 8/16/88
TWC, FO 9/30/86
TWC, EV 12/30/85

- D. Enforcement Actions - None for Safety-Kleen/Irving.

III. SUMMARY

The Safety-Kleen/Irving facility is located on the west side of Suzanne Drive, 500 feet south of Grauwyler Road and 1000 feet east of Loop 12; Dallas County, Texas. The site is situated in the northeast portion of the city of Irving in an industrial area. The site is not within any 100-year floodplain.

Presently, this site embraces five waste management units including one above-grade 5,000 gallon carbon steel tank, two separate container storage areas, and one exchange station (aka Return/Fill Shelter), and one below-grade 10,000-gallon carbon steel tank (closed).

Clean solvents are leased from Safety-Kleen and subsequently returned as spent or contaminated solvent (a waste material). At this site, small quantities of spent solvent are combined into larger volumes and ultimately shipped to a Safety-Kleen recycling facility or similar contract reclaimer. After the impurities are removed from the spent solvent, the product (solvent) is returned to the Irving facility for distribution; thus forming a solvent circuit.

IV. RECOMMENDED ACTION

A visual site inspection is recommended for the entire facility to look for visual signs of releases, determine the status of each unit, and to look for waste management units which might not otherwise be found.

PRELIMINARY REVIEW UNIT CHECKLIST

Facility: Safety-Kleen/Irving
EPA I.D.#: TXD 981052061
ISW #: 55194

Reviewer: Leon Byrd
HAZSIT #: None
Date: 3-19-90

I. Waste Management Unit:

RCRA: Spent solvent tank - Area "A"

II. Evidence of Release:

There is no known release of hazardous waste or hazardous constituents to the environment from this unit.

III. Pollutant Dispersal Pathways:

See Attachment I

IV. Waste Characteristics:

The following list of hazardous waste and hazardous constituents has been declared for this unit:

Spent mineral spirits (D001)
Cadmium (D006)
Lead (D008)

V. Target Population of Concern:

See Attachment II

VI. Documents Reviewed:

Correspondence files, inspection reports, and Parts A and B of the Permit Application.

VII. Site Description: (See Attachment III)

This unit is described as being an above-grade, 15,000 gallon, carbon steel tank having the following dimensions: 10.5' in diameter by 26' long by 1/4" thick. The secondary containment is described as being monolithically-poured, reinforced concrete. The concrete vault chamber features a eight-inch-thick perimeter wall and a six-inch-thick support base slab. The secondary containment volume is 95,505 gallons. This tank was placed in service on 2/2/85.

VIII. Summary:

No additional information is needed about this unit.

IX. Recommended Actions:

A visual site inspection is recommended for this unit to (1) to look for visual signs of releases and (2) determine the status of this unit.

PRELIMINARY REVIEW UNIT CHECKLIST

Facility: Safety-Kleen/Irving
EPA I.D. #: TXD 981052061
ISW #: 55194

Reviewer: Leon Byrd
HAZSIT #: None
Date: 3-19-90

I. Waste Management Unit:

RCRA: Drum Storage Area - Fenced area within Existing Building, Area "C"

II. Evidence of Release:

There is no known release of hazardous waste or hazardous constituents to the environment from this unit.

III. Pollutant Dispersal Pathways:

See Attachment I

IV. Waste Characteristics:

The following list of hazardous waste and hazardous constituents has been declared for this unit.

Spent mineral spirits (D001)
Cadmium (D006)
Lead (D008)
dry cleaning waste (F002)
spent immersion cleaner
halogenated solvents (F002)
non-halogenated solvents (F004)

V. Target Populations of Concern:

See Attachment II

VI. Documents Reviewed:

Correspondence files, inspection reports, and Parts A and B of the Permit Application.

VII. Site Description: (See Attachment III)

This unit is described as being an area within a warehouse enclosed by a six (6') high chain-link fence. The secondary containment volume is reported to be 778 gallons which is achieved by two sumps in the the concrete floor, one measuring 8'x1'x2' and the other is 12'x2'x3'. This unit's capacity is 6,912 gallons. The unit was put into service on 4/5/84.

VIII. Summary:

No additional information is needed about this unit.

IX. Recommended Actions:

A visual site inspection is recommended for this unit to (1) to look for visual signs of releases and (2) determine the status of this unit.

PRELIMINARY REVIEW UNIT CHECKLIST

Facility: Safety-Kleen/Irving
EPA I.D. #: TXD 981052061
ISW #: 55194

Reviewer: Leon Byrd
HAZSIT #: None
Date: 3-19-90

I. Waste Management Unit:

RCRA: Container Storage - Metal Shelter, Area "D"

II. Evidence of Release:

There is no known evidence of release of hazardous waste or hazardous constituents to the environment from this unit.

III. Pollutant Dispersal Pathways:

See Attachment I

IV. Waste Characteristics:

The following list of waste constituents has been declared for this unit:

- spent mineral spirits (D001)
- paint waste
- cadmium (D006)
- chromium (D007)
- lead (D008)
- spent non-halogenated solvents (F003)
- spent non-halogenated solvents (F005)

V. Target Populations of Concern:

See Attachment II

VI. Documents Reviewed:

Correspondence files, inspection reports, and Parts A and B of the Permit Application.

VII. Site Description:

Described as a prefabricated metal building which has been positioned over a contractor-placed reinforced concrete slab. The secondary containment volume is reported to be 1122 gallons which is achieved by the use of a metal drip pan. The unit's declared capacity is 2200 gallons. The unit was placed in service on 9/1/87. No other data are available.

VIII. Summary:

No additional information is needed about this unit.

IX. Recommended Action:

A visual site inspection is recommended for this unit to (1) to look for visual signs of releases and (2) determine the status of this unit.

PRELIMINARY REVIEW UNIT CHECKLIST

Facility : Safety-Kleen/Irving
EPA I. D. #: TXD 981052061
ISW #: 55194

Reviewer: Leon Byrd
HAZSIT #: None
Date: 3-19-90

I. Waste Management Unit:

RCRA: Return/Fill Shelter

II. Evidence of Release:

There is no known evidence of release of hazardous waste or hazardous constituents to the environment from this unit.

III. Pollutant Dispersal Pathways:

See Attachment I

IV. Waste Characteristics:

The function of this unit suggests that the following waste materials are likely to be present at any given time:

spent mineral spirits (D001, D006, D008)
spent carburetor cleaner (F002, F004)
spent halogenated solvents (F002)
paint wastes (F003, F005)

V. Target Populations of Concern:

See Attachment II

VI. Documents Reviewed:

Correspondence files, inspection reports, and Parts A and B of the Permit Application.

VII. Site Description:

Described as being a three-sided shed which is constructed of corrugated metal sides and roof over a structural steel frame. The floor is elevated to loading dock height (1 meter +). The age of this unit and its associated functioning characteristics are unknown.

VIII. Summary:

No additional information is needed about this unit.

IX. Recommended Actions:

A visual site inspection is recommended for this unit to (1) to look for visual signs of releases and (2) determine the status of this unit.

PRELIMINARY REVIEW UNIT CHECKLIST

Facility : Safety-Kleen/Irving
EPA I. D. #: TXD 981052061
ISW #: 55194

Reviewer: Leon Byrd
HAZSIT #: None
Date: 3-19-90

I. Waste Management Unit:

Spent Solvent tank (Closed) - Area "B"

II. Evidence of Release:

There is no known evidence of release of hazardous waste or hazardous constituents to the environment from this unit.

III. Pollutant Dispersal Pathways:

See Attachment I

IV. Waste Characteristics:

The function of this unit suggests that the following waste materials are likely to be present at any given time:

spent mineral spirits (D001, D006, D008)

V. Target Populations of Concern:

See Attachment II

VI. Documents Reviewed:

Correspondence files, inspection reports, and Parts A and B of the Permit Application.

VII. Site Description:

This unit is described as being a below-grade, 10,000 gallon, carbon steel tank. This tank was placed in service on 4/5/84 and taken out of service on 3/1/87.

VIII. Summary:

No additional information is needed about this unit.

IX. Recommended Actions:

A visual site inspection is recommended for this unit to (1) to look for visual signs of releases and (2) determine the status of this unit.

ATTACHMENT I
Pollution Dispersal Pathways

Surface water runoff and spillage, based on a 7.5 minute USGS topo map, appears to flow generally southwest from the property to an unnamed creek which flows into the Elm Fork of the Trinity River, thence into the Trinity River. The decrease in elevation from the property to the creek is about 50 feet.

Atmospheric air appears, based on the windrose provided in Appendix C, in the Part B, flows in all directions with the dominant directions being in the southerly direction followed by the northerly direction.

Information concerning the geology of the site area or the groundwater in the area has not been provided.

The source of the foregoing information has been the Part B.

ATTACHMENT II

TARGET POPULATIONS OF CONCERN

The Safety-Kleen/Irving, Texas facility is located in the northeast portion of the city of Irving in an industrial area. The population of Irving and the contiguous metropolitan area is 3,765,000 including the Dallas/Fort Worth area.

Because Safety-Kleen/Irving is located in a suburban setting, its sphere of influence may extend into the following areas:

Airborne Contamination - emissions bearing hazardous waste or hazardous constituents would, during the course of a year, have a chance of traveling in any cardinal direction with no tendency to favor any particular path.

Surface Runoff - has the potential to affect individuals and substances with whom it comes in contact on traveling down slope. However, considering the area soil permeability, it is unlikely that runoff would travel very far before infiltrating the surface soil layer.

The potential impact of groundwater contamination cannot be evaluated because groundwater and geologic information has not been provided.

ATTACHMENT III

Site Description

Safety-Kleen Corporation has applied to the Texas Water Commission (TWC) for a hazardous waste permit to operate existing storage units at its Irving, Texas facility. The facility will store and process off-site and on-site-generated Class I industrial solid waste which is destined for recycling/reprocessing at a Safety-Kleen facility at a different address.

The Safety-Kleen/Irving facility is located on the west side of Suzanne Drive, 500 feet south of Grauwlyer Road and 1000 feet east of Loop 12; Dallas County, Texas. The site is situated in Segment 0822 of the Trinity River Basin (north latitude 32° 49' 41" west longitude 96° 54' 44").

RCRA

PART II - UNIT EVALUATION

TWC Regis. No. 55194

CONTAINER STORAGE

Regis. Facility No. A

UNIT IDENTIFICATION: Tank (active since 2-22-85) 1

- A. Verification of Physical Construction and Operation
(dimensions, years of service, containment features eg.
concrete pads, dikes, indoor)

15,000 gals., 3 years, above-ground, concrete
pad with dikes

- B. Characterization of Waste Materials (facility records, sample
results, process description, constituents of concern,
documentation)

001 - 990001 Characteristics of Legitimacy

- C. Visual/Physical Inspection of Unit

1. Conditions of ~~drums~~ Tank

Good

2. Rainfall controls (run-on/runoff controls, stormwater collection and disposal, analyses)

Rain on area

Will be covered in the future
no time frame

3. Evidence of spillage/leakage (visual and olfactory evidence, dead vegetation, etc.)

None

4. Evidence of actual or potential groundwater contamination (samples from monitor wells, knowledge of shallow water tables, operating practices)

None

5. Air quality concerns (TACB complaints, odors, particulate dispersal, sampling records)

N/A,

D. Other Areas of Concern

None

E. Summary/General Comments

Secondary Containment Adequate
Coated

RLRA

PART II - UNIT EVALUATION

TWC Regis. No. 55194

CONTAINER STORAGE

Regis. Facility No. B

UNIT IDENTIFICATION: Tank (10,000 gallons) Inactive 4-5-84 to

- A. Verification of Physical Construction and Operation 3-1-87
(dimensions, years of service, containment features eg.
concrete pads, dikes, indoor)

Closed
site is paved now

- B. Characterization of Waste Materials (facility records, sample
results, process description, constituents of concern,
documentation)

Spent mineral Spirits
D001, D006, D008

- C. Visual/Physical Inspection of Unit

1. Conditions of drums

2. Rainfall controls (run-on/runoff controls, stormwater collection and disposal, analyses)

3. Evidence of spillage/leakage (visual and olfactory evidence, dead vegetation, etc.)

4. Evidence of actual or potential groundwater contamination (samples from monitor wells, knowledge of shallow water tables, operating practices)

5. Air quality concerns (TACB complaints, odors, particulate dispersal, sampling records)

D. Other Areas of Concern

None

E. Summary/General Comments ,

Closed in 87?

June 1987 TWC rec'd Certification of Closure

Oct. 1988 TWC accepted " " "

RCRA

PART II - UNIT EVALUATION

TWC Regis. No. 55194

CONTAINER STORAGE

Regis. Facility No. C

UNIT IDENTIFICATION: Drum Storage Area (active since 4-5-84)

- A. Verification of Physical Construction and Operation
(dimensions, years of service, containment features eg.
concrete pads, dikes, indoor)

Need 7000 gallon Capacity

- B. Characterization of Waste Materials (facility records, sample
results, process description, constituents of concern,
documentation)

001, 002, 003, see attached W.R.

- C. Visual/Physical Inspection of Unit

1. Conditions of drums

Good

2. Rainfall controls (run-on/runoff controls, stormwater collection and disposal, analyses)

N/A in Covered Building

3. Evidence of spillage/leakage (visual and olfactory evidence, dead vegetation, etc.)

None

4. Evidence of actual or potential groundwater contamination (samples from monitor wells, knowledge of shallow water tables, operating practices)

None

5. Air quality concerns (TACB complaints, odors, particulate dispersal, sampling records)

N/A

D. Other Areas of Concern

None

E. Summary/General Comments

Floor has coating
Druple Sunys capacity

RCRA

PART II - UNIT EVALUATION

TWC Regis. No. 55194

CONTAINER STORAGE

Regis. Facility No. D

UNIT IDENTIFICATION:

Drum Storage (since 6-1-87)

- A. Verification of Physical Construction and Operation
(dimensions, years of service, containment features eg.
concrete pads, dikes, indoor)

15' x 20' , 2200 gallons. inside
metal shelter

- B. Characterization of Waste Materials (facility records, sample
results, process description, constituents of concern,
documentation)

004 see attached NOR
paint waste

- C. Visual/Physical Inspection of Unit

1. Conditions of drums

Good

2. Rainfall controls (run-on/runoff controls, stormwater collection and disposal, analyses)

N/A Inside Building

3. Evidence of spillage/leakage (visual and olfactory evidence, dead vegetation, etc.)

None

4. Evidence of actual or potential groundwater contamination (samples from monitor wells, knowledge of shallow water tables, operating practices)

None

5. Air quality concerns (TACB complaints, odors, particulate dispersal, sampling records)

N/A

D. Other Areas of Concern

None

E. Summary/General Comments

Elevated grate 3' off concrete pad.
Carbon steel trough underneath.

Covered Bldg.
Good Ventilation

RCRA

PART II - UNIT EVALUATION

TWC Regis. No. 55194

CONTAINER STORAGE

Regis. Facility No.

UNIT IDENTIFICATION: Return fill Shelter

- A. Verification of Physical Construction and Operation
(dimensions, years of service, containment features eg.
concrete pads, dikes, indoor)

Each 60 gallons each

- B. Characterization of Waste Materials (facility records, sample
results, process description, constituents of concern,
documentation)

Spent solvents D001, D006, D008

- C. Visual/Physical Inspection of Unit

1. Conditions of drums

NA

2. Rainfall controls (run-on/runoff controls, stormwater collection and disposal, analyses)

Covered

3. Evidence of spillage/leakage (visual and olfactory evidence, dead vegetation, etc.)

None

4. Evidence of actual or potential groundwater contamination (samples from monitor wells, knowledge of shallow water tables, operating practices)

None

5. Air quality concerns (TACB complaints, odors, particulate dispersal, sampling records)

N/A

D. Other Areas of Concern

None

E. Summary/General Comments

Secondary Containment Coated